

**To:** Greenberg, Leslie[Greenberg.Leslie@epa.gov]  
**From:** Albright, David  
**Sent:** Wed 1/11/2017 9:22:05 PM  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

I'd suggest you talk with Kate when she is back or send her a message now as she is checking email periodically. Thanks.

David Albright | Drinking Water Protection Section | EPA Region 9 San Francisco | 415 972-3971

**From:** Greenberg, Leslie  
**Sent:** Wednesday, January 11, 2017 12:51 PM  
**To:** Albright, David <Albright.David@epa.gov>  
**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi David,

Nancy forwarded the TDM below. It doesn't appear Kate copied Nancy Parrotta, HQ PO, on this new work request. After I receive and approve the amended TMD should I send my approval to Nancy Parrotta? I don't see any examples in Kate's online files of prior amendment approvals. Nancy Parrotta is in right now, so I can call and ask her.

Thanks,

Leslie

## Leslie Ann Greenberg

Leslie Ann Greenberg

U.S. EPA, Region 9

Drinking Water Protection Section (WTR-3-2)

Tribal and State Assistance Branch

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[Greenberg.leslie@epa.gov](mailto:Greenberg.leslie@epa.gov)

**From:** Rumrill, Nancy

**Sent:** Wednesday, January 11, 2017 12:00 PM

**To:** Greenberg, Leslie <[Greenberg.Leslie@epa.gov](mailto:Greenberg.Leslie@epa.gov)>

**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

FYI - Here's the first TDM. There may be another one revising this one. Checking, Nancy



United States Environmental Protection Agency

*Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))*

*Drinking Water Protection Section (WTR-3-2)*

*US EPA, Region IX*

*75 Hawthorne St.*

*San Francisco, CA 94105*

*Phone (415) 972-3293*

**From:** Rumrill, Nancy

**Sent:** Friday, January 06, 2017 4:38 PM

**To:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>

**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi David,

I forgot that we already have Task 5 consultation in the TDM. We will need to discuss some of the broader issues with Jim the week of January 16 to prepare for the Jan 24 call or visit. I will need to update the Task 5 consultation with Kate.

Thanks, Nancy



United States Environmental Protection Agency

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**From:** Rao, Kate

**Sent:** Friday, December 16, 2016 10:39 AM

**To:** JAMES D WALKER <jameswalker5@msn.com>; Jonathan.Koplos@cadmusgroup.com

**Cc:** Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>

**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan/Jim --

We just received a response from Excelsior addressing our Oct 2016 Notice Of Deficiency letter (see attached). Therefore, we need assistance under Task 4 for technical review (see below email thread for initial TDM).

**Under Task 4 (Project Technical Review)**, the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- o Material: Excelsior NOD response and Excelsior ADEQ APP supplement permit application.
- o Estimated LOE: Ex. 4 - CBI
- o Deliverable: Prepare written comments in a format agreed upon with Nancy during kick-off call (TBD)
- o Schedule:
  - Kick-off call: Nancy will coordinate with Jim but will target week of December 29<sup>th</sup>
  - Deliverable: written comments due week of January 9<sup>th</sup>

- Call with Excelsior: Tentatively 1/24/2017 [Nancy will coordinate directly with Jim on call logistics.]

I plan to mail the material directly to Jim today. In addition to the NOD response, I will include a copy Excelsior's ADEQ APP supplemental permit application. There is info/material in the supplemental application that might be useful for your review of the NOD response.

Please let me know if you have any questions.

Kate

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Kate Rao  
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75 Hawthorne St., San Francisco, CA 94105  
tel: (415) 972-3533 / fax: (415) 947-3549

**From:** Rao, Kate

**Sent:** Wednesday, November 02, 2016 10:19 AM

**To:** [Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com)

**Cc:** JAMES D WALKER <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>; Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>

**Subject:** Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you when I get more information.

Thanks. Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 1-90**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ1-FY-16-1**

**Task 4 (Project Technical Reviews) & Task 5 (Consultation)**

**Technical Direction**

**Background:** Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project\_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

**Under Task 5 (Consultation),** the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material.

- Material: Will be sent prior to call or discussed on call.
- Estimated LOE: Ex. 4 - CBI per call (includes prep time)
- Deliverable: Summary of consultation support -- noted in monthly progress report and if

possible, within 5 working days of the conference call, send draft notes to EPA via email.

a. Call scheduled for Tuesday, November 8<sup>th</sup> from 8:30 am to 11:00 am. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.

- Material to review: 6/8/2016 Cadmus comments and 10/14/2016 NOD.

- LOE: **Ex. 4 - CBI** (includes prep and calls)

- Deliverable: written summary of consultation provided on call.

**Under Task 4 (Project Technical Review)**, the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- o Material: same as under Consultation Task and additional material as provided by the applicant.

- o Estimated LOE: **Ex. 4 - CBI** per review.

- o Deliverable: Prepare written comments in a format agreed upon when tech review is requested.

- o Schedule: 1 – 2 weeks for each request unless noted otherwise.

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